

KRISTA PECOR, on behalf of herself and a  
class of employees and/or former employees  
similarly situated,

*Plaintiff,*

-VS-

NORTH POINT EDC, INC., *d/b/a* NORTH  
POINT EXOTIC DANCE CLUB, DAVID  
NICHOLS and BILLIE JO RANSOM,

*Defendants.*

DEFENDANTS North Point EDC, Inc., doing business as North Point Exotic Dance Club, David Nichols and Billie Jo Ransom (hereinafter referred to as “Defendants” or “Defendant EDC” or “Defendant Nichols” or “Defendant Ransom” as the case may appear), with their offices and principal place of business at N2085 Vernon Hills Drive, in the Village of Peshtigo, County of Marinette and State of Wisconsin 54157, by way of Answer to the Complaint of the Plaintiff, say as follows:

## **INTRODUCTION**

1. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

2. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

3. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

4. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **PARTIES**

5. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

6. Defendants admit the allegations of this paragraph of the Complaint that Plaintiff is a party Plaintiff, but can neither admit nor deny the remaining allegations of this paragraph of the Complaint, and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

7. Defendants admit the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

8. Defendants deny the allegations of this paragraph of the Complaint, as the principal office and the office of its registered agent is N2085 Vernon Hills Drive, in the Village of Peshtigo, County of Marinette and State of Wisconsin 54157. Defendants admit that the registered agent of Defendant North Point EDC, Inc., is David Nichols. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

9. Defendants admit the allegations of this paragraph of the Complaint except as to the allegations of indefinite residence in Wisconsin which is denied as being speculative. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

10. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

11. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

### **FACTUAL ALLEGATIONS**

12. Defendants admit the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

13. Defendants admit that Plaintiff and others perform dances at the Club, but deny that such dancing is done as an employee. As to the remaining allegations of this paragraph of the Complaint, Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

14. Defendants admit that Plaintiff and others perform dances at the Club, but deny that such dancing is done as a duty of Plaintiff. As to the remaining allegations of this paragraph of the Complaint, Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

15. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

16. Defendants admit the allegations of this paragraph of the Complaint as Plaintiff is considered to be an independent contractor, but deny the remaining allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

17. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

18. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

19. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

20. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

21. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon.

Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

22. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

23. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

24. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

25. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

26. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

- a. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

- b. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- c. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- d. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- e. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

27. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

- a. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- b. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- c. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- d. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

28. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

29. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

30. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

#### **CLASS ALLEGATIONS**

31. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

- a. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- b. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

32. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.



- a. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- b. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- c. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- d. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- e. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- f. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- g. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- h. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- i. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

- j. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- k. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- l. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- m. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- n. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- o. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- p. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.
- q. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

33. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon.

Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

34. Defendants deny the allegations of this paragraph of the Complaint thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

35. Defendants are without knowledge and information sufficient to form a belief as to the allegations of this paragraph of the Complaint and leave the Plaintiff to her proofs thereon. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

36. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

37. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

38. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

### **COUNT ONE**

#### **FAILURE TO PAY MINIMUM WAGE UNDER THE FAIR LABOR STANDARDS ACT**

39. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations and Class Allegations, and reallege them and incorporate them as if more fully set forth at length herein.

40. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

41. Defendants deny the allegations of this paragraph of the Complaint, except as to the first (1<sup>st</sup>) sentence. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **COUNT TWO**

### **FAILURE TO PAY OVERTIME UNDER THE FAIR LABOR STANDARDS ACT**

42. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One, and reallege them and incorporate them as if more fully set forth at length herein.

43. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

44. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **COUNT THREE**

### **UNLAWFUL DEDUCTION OF WAGES UNDER THE FAIR LABOR STANDARDS ACT**

45. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Two and reallege them and incorporate them as if more fully set forth at length herein.

46. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

#### **COUNT FOUR**

##### **FAILURE TO PAY MINIMUM WAGE UNDER WISCONSIN LAW, WIS.STAT. § 109.03(5)**

47. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Three and reallege them and incorporate them as if more fully set forth at length herein.

48. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

49. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

#### **COUNT FIVE**

##### **FAILURE TO PAY OVERTIME UNDER WISCONSIN LAW, WIS.STAT. § 109.03(5)**

50. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Four, and reallege them and incorporate them as if more fully set forth at length herein.

51. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **COUNT SIX**

### **UNLAWFUL DEDUCTION OF WAGES UNDER WISCONSIN LAW**

52. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Five and reallege them and incorporate them as if more fully set forth at length herein.

53. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **COUNT SEVEN**

### **CONVERSION**

54. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Six, and reallege them and incorporate them as if more fully set forth at length herein.

55. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

## **COUNT EIGHT**

### **UNJUST ENRICHMENT**

56. Defendants restate their answers to the allegations of the Introduction, Parties, Factual Allegations, Class Allegations and Count One through Count Seven, and reallege them and incorporate them as if more fully set forth at length herein.

57. Defendants deny the allegations of this paragraph of the Complaint. Furthermore, to the extent that said allegations call for a legal conclusion which the Defendants are unqualified to render, no answer can be made one way or the other.

### **PRAYER FOR RELIEF**

WHEREFORE, Defendants demand judgment dismissing the Complaint of the Plaintiff with prejudice in its entirety, for costs and fees of this litigation including, but not limited to attorney fees, interests and costs of suit, and for all other relief in law or equity as the Court may deem appropriate under the circumstances of this case.

### **AFFIRMATIVE DEFENSES**

#### **First Affirmative Defense**

Plaintiff fail to state a claim upon which relief can be granted and Defendants reserve the right to move pursuant to *F.R.Civ.P.* 12(b)(6) for dismissal thereon at any time permitted under the common law or the Federal Rules of Civil Procedure.

#### **Second Affirmative Defense**

The court lacks jurisdiction, in whole or in part, to grant the relief requested by the Plaintiff against the Defendants and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Third Affirmative Defense**

The acts or omissions to act complained of by the Plaintiff are due, in whole or in part, to the actions or omissions to act of third parties over whom these answering Defendants have no authority, control or discretion and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Fourth Affirmative Defense**

The acts or omissions to act complained of by the Plaintiff are due, in whole or in part, to the actions or omissions to act of supervening causes over which these answering Defendants have no authority, control and/or discretion and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Fifth Affirmative Defense**

The Plaintiff has failed to exhaust any and/or all of her remedies in such cases made and provided and the Court therefore lacks jurisdiction under the doctrine of exhaustion of remedies.

#### **Sixth Affirmative Defense**

The Plaintiffs have failed to pursue any of their administrative remedies under Wisconsin Law and the Court therefore lacks jurisdiction under the doctrine of Primary Jurisdiction.

#### **Seventh Affirmative Defense**

Plaintiffs' suit is barred by the doctrine of laches and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Eighth Affirmative Defense**

The Plaintiff fails to establish any grounds for entitlement to declaratory and/or injunctive relief as set forth in the cases made and provided in such cases against the Defendants and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Ninth Affirmative Defense**

The Plaintiff assumed the risk that their acts and/or omissions to act might result in any or all of the consequences, damages and/or injuries sustained by the Plaintiff and the Complaint must therefore be dismissed with prejudice in its entirety.

#### **Tenth Affirmative Defense**



The purported Class Of Plaintiff dancers is not similarly situated and there is no purported interest in joining to meet the requirements of 29 *U.S.C.* § 216(b).

**Eleventh Affirmative Defense**

Class Certification should be denied because the putative Class lacks Numerosity, Commonality, Typicality and/or Representativeness under *F.R.Civ.P.* 23(a).

**RESERVATION OF RIGHT TO  
PLEAD ADDITIONAL AFFIRMATIVE  
DEFENSES**

Defendants reserve the right to plead additional affirmative defenses as discovery proceeds and as necessary and appropriate under the circumstances of this case up to or at the time of trial.

**JURY DEMAND**

Defendant hereby demands a jury trial by a unanimous jury of twelve (12) jurors as to all claims or Counts set forth now or later in the Complaint as the same may be amended.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the Federal Rules of Civil Procedure, Eric M. Bernstein, Esquire, of the Law Firm of Eric M. Bernstein & Associates, L.L.C. is designated as trial counsel of record for the Defendants in the above captioned matter.

**DEMAND FOR ANSWERS TO INTERROGATORIES**

Defendants hereby demand that Plaintiff provide answers to Interrogatories and Supplemental Interrogatories when ordered pursuant to the Initial Case Management Order and as provided by the Court, within the time provided by the Federal Rules of Civil Procedure and the Initial Case Management Order.

**CERTIFICATION OF SERVICE PURSUANT TO *F.R.Civ. P. 5.***

The undersigned certifies that a true copy of the within Answer and Affirmative Defenses was, or will be, served upon all parties herein within the time period allowed by *F.R.Civ.P. 5*. or other Rule or Rules in such cases made and provided.

**CERTIFICATION OF COMPLIANCE WITH *F.R.Civ. P. 5.2(a)***  
**REGARDING PROHIBITION ON SUBMISSION OF CONFIDENTIAL**  
**PERSONAL IDENTIFIERS TO THE COURT**

The undersigned hereby certifies that I have redacted confidential personal identifiers from all documents prior to filing, unless provision of the personal identifier(s) is required by statute, court rule, administrative directive or court order, and that subsequent submissions will not contain such identifiers.

ERIC M. BERNSTEIN & ASSOCIATES, L.L.C.  
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Attorneys for Defendants North Point EDC, Inc., d/b/a North Point  
Exotic Dance Club, David Nichols and Billie Jo Ransom  
Our File No. 2167-001

By: *Eric M. Bernstein* /s/  
Eric M. Bernstein, Esquire, NJ Bar ID # 014001982

Dated: November 7, 2016